

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Aurelio BARAJAS-Pulido

Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 8, 2022 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

Title 8 United States Code, Section
 1324(a)(1)(A)(ii) and (v)(I)

Offense Description

Did knowingly transport and move, attempt to transport and move, and
 conspired to transport and move within the United States by means of
 transportation and otherwise, an alien who had come to, entered, remained in
 the United States in violation of law in furtherance of such violation, for the
 purpose of commercial advantage and private financial gain.

This criminal complaint is based on these facts:

See attachment "A".

☒ Continued on the attached sheet.

/S/ Taiwan Dowd

Complainant's signature

Submitted by reliable electronic
 means per Fed.R.Crim.P. 4.1, Taiwan Dowd
 sworn to and signature attested
 telephonically on February 10, 2022,
 at Laredo, Texas.

Diana Song Quiroga
 DIANA SONG QUIROGA
 UNITED STATES MAGISTRATE JUDGE

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Attachment A

1. On February 8, 2022, a Border Patrol Agent (BPA) was working his assigned duties at the U.S. Border Patrol (USBP) checkpoint (B35), located on U.S. Hwy 83 north of Laredo, Texas. At approximately 7:30 P.M., a green tractor hauling a white refrigerated trailer with one (1) visible occupant approached the primary vehicle inspection lane.
2. BPAs conducted an immigration inspection on the driver, later identified as Aurelio BARAJAS-Pulido (hereinafter referred to as BARAJAS-Pulido). BPAs asked BARAJAS-Pulido if he was a United States citizen and BARAJAS-Pulido stated “no, permanent resident”. BPAs asked BARAJAS-Pulido were there anymore passengers and BARAJAS-Pulido stated “no”. BARAJAS-Pulido proceeded to present BPAs with a bill of lading and a Permanent Resident Card. BPAs observed the front of the trailer refer was set to a temperature of 45 degrees Fahrenheit however, the current temperature trailer read 60 degrees Fahrenheit.
3. The BPA Canine handler informed the primary BPA the service canine had alerted to the tractor-trailer. The BPA directed BARAJAS-Pulido to the secondary inspection area for further inspection. During the secondary inspection, BPAs asked and received consent from BARAJAS-Pulido to search the trailer. BPAs proceeded to cut the combination lock and seal on the trailer.
4. Upon opening the trailer doors, BPAs discovered seventy-eight (78) subjects inside of the trailer. BPAs conducted an immigration inspection on all seventy-eight (78) subjects and determined all subjects were undocumented individuals (UDIs) illegally present in the United States, with no documents to be in or stay in the United States. Three (3) UDIs were unaccompanied minors, which included a pregnant 15-year-old.
5. BPAs placed BARAJAS-Pulido under arrest along with the seventy-eight (78) UDIs. BPAs contacted Homeland Security Investigations (HSI) Special Agents (SAs) for investigative assistance. HSI SAs responded to the Laredo West Station checkpoint and conducted post arrest interviews. Under Miranda rights advisement and waiver thereof, BARAJAS-Pulido agreed to speak to HSI SAs without an attorney present.
6. BARAJAS-Pulido stated he does not have a valid commercial driver’s license (CDL); and he is currently unemployed BARAJAS-Pulido stated his male friend (hereinafter identified to as CC1) who resides in San Antonio, Texas, offered him a job to transport a tractor-trailer from Laredo, Texas to El Paso. BARAJAS-Pulido stated CC1 offered to pay him (BARAJAS-Pulido) approximately \$1100-\$1500 United States dollars (USD) for a weeks’ worth of work. BARAJAS-Pulido stated he accepted the job while visiting his family in California. BARAJAS-Pulido stated he purchased an airline ticket for approximately \$420 USD, to travel from California to San Antonio.
7. BARAJAS-Pulido stated on February 6, 2022, at approximately 12:00p.m., he arrived at the San Antonio airport. BARAJAS-Pulido stated up on arrival a male (hereinafter identified as CC2) picked him up from the airport and they immediately traveled to

Laredo. BARAJAS-Pulido stated upon arrival in Laredo, CC2 rented a room located at the 4900 block of San Bernardo Ave. BARAJAS-Pulido stated they stayed in the room for approximately two (days) until the tractor-trailer was ready.

8. BARAJAS-Pulido stated on the morning of February 8, 2022, CC1 informed him the tractor-trailer would need to be picked up from the 1000 block of Beltway drive and transported to El Paso, Texas. BARAJAS-Pulido stated at approximately 12:30p.m., CC2 dropped him (BARAJAS-Pulido) off at the 1000 Block of Beltway drive. BARAJAS-Pulido stated the tractor and trailer was not connected upon his arrival. BARAJAS-Pulido stated after he conducted an inspection of the tractor, he connected both the tractor and trailer.
9. BARAJAS-Pulido stated he waited around and inside of the business located at the 1000 block of Beltway drive until he was notified by CC1 the tractor-trailer was ready to move. BARAJAS-Pulido stated between 5:00p.m. or 6:00 p.m., he departed the 1000 Block of Beltway enroute to El Paso. BARAJAS-Pulido stated he was in possession of a bill of lading which listed the load containing broccoli and cauliflower.
10. BARAJAS-Pulido provided HSI SAs consent to search his mobile device. BARAJAS-Pulido stated he deleted all the contact information and messages from CC1 prior to leaving the 1000 Block of Beltway drive. BARAJAS-Pulido stated he did not have the contact information for CC2.
11. Johan Anderson Melendez (El Salvador National) and Adrian Centeno-Grajales (Mexican National), are being held as material witnesses to the human smuggling event. All material witnesses admitted to illegally entering the United States by crossing the Rio Grande River to be smuggled to various locations for various amounts of money.